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*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SIXTA T. GARCIA,

Plaintiff,

Case No.:  
07-CV-5292 (AKH)

-against-

ALAN KASMAN DBA KASCO, ANN TAYLOR  
STORES CORPORATION, B.C.R.E., BATTERY  
PARK CITY AUTHORITY, BFP ONE LIBERTY  
PLAZA CO., LLC, BLACKMON-MOORING-  
STEAMATIC CATASTOPHE, INC. D/B/A BMS  
CAT, BROOKFIELD FINANCIAL PROPERTIES,  
INC., BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., EMPIRE STATE  
PROPERTIES, INC., ENVIROTECH CLEAN AIR,  
INC., GENERAL RE SERVICES CORP., GPS  
ENVIRONMENTAL CONSULTANTS, INC.,  
HILLMAN ENVIRONMENTAL GROUP, LLC.,  
HUDSON TOWERS HOUSING CO., INC., INDOOR  
ENVIRONMENTAL TECHNOLOGY, INC., KASCO  
RESTORATION SERVICES CO., LEFRAK  
ORGANIZATION, INC., MERRILL LYNCH & CO,  
INC., NATIONAL ASSOCIATION OF SECURITIES  
DEALERS, INC., NEW LIBERTY PLAZA LP, NEW  
YORK CITY ECONOMIC DEVELOPMENT  
CORPORATION, NEW YORK CITY INDUSTRIAL  
DEVELOPMENT AGENCY, NEW YORK CITY

**NOTICE OF ADOPTION  
OF ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

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INDUSTRIAL DEVELOPMENT CORPORATION,  
NEW YORK TELEPHONE COMPANY, NOMURA  
HOLDING AMERICA, INC., NOMURA  
SECURITIES INTERNATIONAL, INC., ONE  
LIBERTY PLAZA, RELATED BPC ASSOCIATES,  
INC., RELATED MANAGEMENT CO., LP,  
STRUCTURE TONE (UK), INC., STRUCTURE  
TONE GLOBAL SERVICES, INC., THE BOARD OF  
MANAGERS OF THE ONE LIBERTY PLAZA  
CONDOMINIUM (CONDO #1178), THE ONE  
LIBERTY PLAZA CONDOMINIUM (CONDO  
#1178), THE RELATED COMPANIES, LP, THE  
RELATED REALTY GROUP, INC., TOSCORP INC.,  
WESTON SOLUTIONS, INC., WFP ONE LIBERTY  
PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO.  
GP, CORP., WFP ONE LIBERTY PLAZA, CO. GP,  
CORP., WFP TOWER B CO. G.P. CORP., WFP  
TOWER B HOLDING CO., LP, WFP TOWER B. CO.,  
L.P., and WORLD FINANCIAL PROPERTIES, L.P.,

Defendants.

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**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 10, 2007

Yours etc.,

**HARRIS BEACH PLLC**

A handwritten signature in black ink, appearing to read 'BAB', is written over a horizontal line.

Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

*Attorney for Defendant*

**LEFRAK ORGANIZATION, INC.**

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New York, New York 10005

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